

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

IN RE:	:	
Allen Windrim	:	Chapter 13
	:	No.: 21-10888-MDC
Debtor(s)	:	

---

RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC  
STAY FILED BY FAY SERVICING, LLC.

Debtor, Allen Windrim, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Fay Servicing, LLC. submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. Debtor believes payments were made. As this Motion does not explicitly state the alleged arrears, Debtor requests Movant to provide their full post-petition accounting.
6. Denied. Debtor avers payments were made. The debtor is also requesting the chance to apply for a Loan Modification
7. There is no #7.
8. There is no #8.
9. No response required.
10. Debtor opposes the same.
11. Denied. This Motion does not explicitly state the total arrears owed thus not providing the debtor the opportunity to cure arrears, if any. Debtor respectfully requests the chance to cure any post-petition arrears.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Respectfully submitted,

Dated: August 25, 2021

/s/ Brad J. Sadek, Esq.

---

Brad J. Sadek, Esq.  
Attorney for the Debtor  
Sadek & Cooper  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
(215) 545-0008

---

CERTIFICATE OF SERVICE

I Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

**William C. Miller, Esq.**  
Chapter 13 Trustee

**Lorraine Gazzara Doyle**  
Attorney for Movant  
Electronic Notice to *bankruptcy@friedmanvartolo.com*

Dated: August 25, 2021

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtor  
1315 Walnut Street  
Suite #502  
Philadelphia, PA 19107